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AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT AND CRIMINAL COMPLAINT

DEC 06 2019

I, Rachel Corn, being duly sworn, depose and state as follows:

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

1. This affidavit is submitted in support of an application for warrants to search the following locations (the "TARGET LOCATIONS"):

- a. The premises located at 221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001;
- b. The person of Anthony Joseph Gonzalez; and
- c. The 2009 Dodge Caravan bearing Virginia tag ULM1042;

2. This affidavit is also made in support of a criminal complaint and arrest warrant for Anthony Joseph Gonzalez ("Gonzalez"), born in 1981, 221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001, for violation of Title 18, United States Code, Section 2251(a) (production of child pornography).

3. I submit that there is probable cause to believe that the TARGET LOCATIONS will contain evidence of Title 18 U.S.C. § 2422(b), (enticement of a minor for the purposes of engaging in illegal sexual activity), Title 18, United States Code, Section 2251(a) (production of child pornography), Title 18, United States Code, Section 2252A(a)(2) (distribution and receipt of child pornography), and Title 18, United States Code, Section 2252A(a)(5)(B) (possession of child pornography) (the "TARGET OFFENSES").

AGENT BACKGROUND

4. I am a Special Agent with the Federal Bureau of Investigation (FBI), Baltimore Division, Baltimore, Maryland. I have been a SA with the FBI since May 2006. Since September 2006, I have primarily investigated federal violations concerning child pornography and the sexual exploitation of children. I have gained experience through training in seminars, classes, and daily work related to conducting these types of investigations. Specifically, I have

received FBI Crimes Against Children training, FBI Innocent Images Online Undercover training, and FBI Peer-to-Peer Network Online Investigation training. I have participated in the execution of numerous search warrants, of which the majority have involved child exploitation and/or child pornography offenses. Many of the child exploitation and/or child pornography search warrants resulted in the seizure of computers, cell phones, magnetic storage media for computers, other electronic media, and other items evidencing violations of federal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A involving child exploitation offenses. I have also participated in the execution of numerous search warrants for online accounts, such as email accounts, online storage accounts and other online communication accounts related to child exploitation and/or child pornography. In the course of my employment with the FBI, I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media and within online accounts.

5. The statements in this affidavit are based in part on information and reports provided by Maryland State Police Department and the Swatara Township (PA) Police Department, and Special Agents of the FBI, and on my experience and background as a Special Agent of the FBI. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Gonzalez has committed criminal violations of 18 U.S.C. § 2251(a) (production of child pornography), and that evidence, fruits, and instrumentalities of the violations of the TARGET OFFENSES are located within the TARGET LOCATIONS.

SUMMARY CONCERNING CHILD PORNOGRAPHY, PERSONS WHO PRODUCE, POSSESS AND COLLECT CHILD PORNOGRAPHY AND HOW USE OF COMPUTERS AND THE INTERNET RELATES TO THE PRODUCTION, POSSESSION, RECEIPT AND DISTRIBUTION OF CHILD PORNOGRAPHY

6. Based on my investigative experience related to child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I have learned that individuals who utilize the internet to view and receive images of child pornography are often individuals who have a sexual interest in children and in images of children, and that there are certain characteristics common to such individuals, including the following:

a. Individuals who have a sexual interest in children or images of children may receive sexual gratification, stimulation, and satisfaction from contact with children, or from fantasies they may have viewing children engaged in sexual activity or in sexually suggestive poses, such as in person, in photographs, or other visual media, or from literature describing such activity.

b. Individuals who have a sexual interest in children or images of children may collect sexually explicit or suggestive materials, in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides and/or drawings or other visual media. Individuals who have a sexual interest in children or images of children oftentimes use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts.

c. Individuals who have a sexual interest in children or images of children frequently maintain their "hard copies" of child pornographic material, that is, their pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings, etc., in the privacy and security of their home or some other secure location. Individuals who have a sexual interest in children or images of children typically retain pictures, films, photographs, negatives, magazines, correspondence, books, tape recordings, mailing lists, child erotica, and videotapes for many years.

d. Likewise, individuals who have a sexual interest in children or images of children often maintain their collections that are in a digital or electronic format in a safe, secure and private environment, such as a computer or cellphone, and surrounding area. These collections are often maintained for several years and are kept close by, usually at the collector's residence, or in online storage, email accounts or other online communication accounts, to enable the individual to view the collection, which is valued highly.

e. Individuals who have a sexual interest in children or images of children also may correspond with and/or meet others to share information and materials, rarely destroy correspondence from other child pornography distributors/collectors, conceal such correspondence as they do their sexually explicit material, and often maintain lists of names,

addresses, and telephone numbers of individuals with whom they have been in contact and who share the same interests in child pornography. This data is typically in digital format, and often maintained on computers, cell phones and in online storage, email accounts or other online communication accounts.

f. Individuals who would have knowledge on how to distribute and receive digital images of child pornography through the use of Peer to Peer networks and other online methods would have gained knowledge of its location through online communication with others of similar interest. Other forums, such as bulletin boards, newsgroups, IRC chat or chat rooms have forums dedicated to the trafficking of child pornography images. Individuals who utilize these types of forums are considered more advanced users and therefore more experienced in acquiring a collection of child pornography images.

g. Individuals who have a sexual interest in children or images of children prefer not to be without their child pornography for any prolonged time period. This behavior has been consistently documented by law enforcement officers involved in the investigation of child pornography.

h. I also know that the location of mobile phones can provide information about the individual's whereabouts, showing the places the holder resides or travels to, including the locations of additional digital devices that the individual possesses, controls, and has access to.

7. Based on my investigative experience related to computer and internet related child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I have learned the following:

a. Computers and computer technology have revolutionized the way in which child pornography is produced, distributed, and utilized. It has also revolutionized the way in which child pornography collectors interact with each other. Child pornography formerly was produced using cameras and film (either still photography or movies.) The photographs required darkroom facilities and a significant amount of skill in order to develop and reproduce the images. As a result, there were definable costs involved with the production of pornographic images. To distribute these on any scale also required significant resources. The photographs themselves were somewhat bulky and required secure storage to prevent their exposure to the public. The distribution of these wares was accomplished through a combination of personal contact, mailings, and telephone calls. Any reimbursement would follow these same paths.

b. The development of computers, smartphones and the internet have added to the methods used by child pornography collectors to interact with and sexually exploit children. Computers, smartphones and the internet serve four functions in connection with child pornography. These are production, communication, distribution, and storage.

c. Mobile devices such as laptop computers, smartphones, iPods, iPads and digital media storage devices are known to be used and stored in vehicles, on persons or other areas outside of the residence.

d. Smartphones have the capability to access the Internet and store information, such as videos and images. As a result, an individual using a smartphone can send, receive, and store files, including child pornography, without accessing a personal computer or laptop. An individual using a smartphone can also easily plug the device into a computer, via a USB cable, and transfer data files from one digital device to another. Many people generally carry their smartphone on their person.

e. Child pornographers can now transfer photographs from a camera onto a computer-readable format. With the advent of digital cameras, the images can now be transferred directly onto a computer. A device known as a modem allows any computer to connect to another computer through the use of telephone, cable, or wireless connection. Electronic contact can be made to literally millions of computers around the world. The ability to produce child pornography easily, reproduce it inexpensively, and market it anonymously (through electronic communications) has drastically changed the method of distribution and receipt of child pornography.

f. Child pornography can be transferred via electronic mail or through file transfer protocols (FTP) to anyone with access to a computer and modem. Because of the proliferation of commercial services that provide electronic mail service, chat services (i.e., "Instant Messaging"), easy access to the Internet, and online file sharing and storage, the computer is a preferred method of distribution and receipt of child pornographic materials.

g. The Internet and its World Wide Web afford collectors of child pornography several different venues for obtaining, viewing, and trading child pornography in a relatively secure and anonymous fashion. Collectors and distributors of child pornography use online resources to retrieve and store child pornography, including services offered by Internet Portals such as AOL Inc., Yahoo, and Google LLC, Facebook, Dropbox, Instagram, among others. The online services allow a user to set up an account with a remote computing service that provides e-mail services, file exchange services, messaging services, as well as electronic storage of computer files in any variety of formats. A user can set up an online storage account from any computer with access to the Internet. Email accounts, online storage accounts, and other online communication accounts allow users to save significant amounts of data, including email, images, videos, and other files. The data is maintained on the servers of the providers, and is occasionally retained by the providers after the user deletes the data from their account.

h. In my recent investigative experience, as well as recent discussions with law enforcement officers, I know that individuals who collect child pornography are using email accounts, online storage accounts, and other online communications accounts to obtain, store, maintain, and trade child pornography with growing frequency, in addition to, or as an alternative to, the use of personal devices.

i. Based on traits shared by collectors, the use of email, online storage accounts, and other online communication accounts, and the increased storage capacity of computers and server space over time, there exists a fair probability that evidence regarding the

distribution, receipt and possession of child pornography will be found in the TARGET LOCATIONS notwithstanding the passage of time.

j. In addition, computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a hard drive, deleted, or viewed via the Internet. Electronic files downloaded to a hard drive can be stored for years at little to no cost. Even when such files have been deleted, they may be recoverable months or years later using readily available forensic tools.

k. When a person “deletes” a file on a home computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space that is, in space on the hard drive that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space for long periods of time before they are overwritten.

l. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file. Similarly, files that have been viewed via the Internet are automatically downloaded into a temporary Internet directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages.

m. The storage capacity of personal computers has increased dramatically over the last few years. Common and commercially available hard drives are now capable of storing over 500 GB of data. With that amount of storage space, an individual could store thousands of video files and/or hundreds of thousands of image files.

n. Thus, the ability to retrieve residue of an electronic file from a hard drive depends less on when the file was downloaded or viewed than on a particular user’s operating system, storage capacity, and computer habits. Since the storage capacity of hard drives has increased dramatically over the last several years, it is more likely that the above-described information will be recovered during forensic analysis.

NCMEC CYBERTIPLINE

8. The National Center for Missing and Exploited Children (NCMEC) receives complaints via their Cybertipline from Internet Service Providers (ISPs), Electronic Service Providers (ESPs), and others. These Cybertipline reports are reviewed by a NCMEC analyst and forwarded to law enforcement for further investigation on the information provided in the Cybertipline report.

PROBABLE CAUSE

9. On July 1, 2018, Jane Doe 1, a minor female, born in December 2001, was interviewed by Maryland State Police investigators regarding her online and in person relationship with an individual identified as Anthony Joseph Gonzalez (“Gonzalez”), born in 1981.

10. Jane Doe 1 advised that her MocoSpace username is carmenbabes1999 and that her profile indicates that she is 18 years old. On approximately June 20, 2018, while on MocoSpace, an individual using the username Anthony._1012 sent her a message. During their subsequent conversations, Anthony._1012 asked sexually based questions and Jane Doe 1 advised Anthony._1012 that she was a virgin. After communicating on MocoSpace for approximately one hour, Anthony._1012 provided the phone number 240-609-2898 (“Gonzalez”) to Jane Doe 1. Jane Doe 1 then spoke to Gonzalez on the phone for approximately two hours. During the conversation, Jane Doe 1 advised Gonzalez that she was only 16 years old and that she had autism. Gonzalez continued to communicate in a sexual manner with Jane Doe 1.

11. Jane Doe 1 and Gonzalez communicated over the next few days over the phone, and by voice and text messages, and their conversations were almost exclusively sexual in nature. Gonzalez asked Jane Doe 1 to send him sexually explicit images of herself using her cell phone, however Jane Doe 1 declined to send the requested images. Gonzalez and Jane Doe 1 discussed meeting in person to engage in sexual activity and Gonzalez stated he would record their sexual activity.

12. During their communications, Gonzalez advised Jane Doe 1 that he resided in Bel Air, Maryland.

13. Jane Doe 1 advised Gonzalez that she was going to Hershey Park with her father

and that they would be staying at the Sleep Inn Hotel, located at 631A Eisenhower Boulevard, Harrisburg, Pennsylvania 17111, for a few nights. Gonzalez and Jane Doe 1 discussed Gonzalez meeting her at the hotel to engage in various sex acts. On June 27, 2018, at approximately 8:30 pm, Gonzalez met Jane Doe 1 at the hotel pool where Jane Doe 1 performed oral sex on Gonzalez. At approximately 10:00 pm, Jane Doe 1 went back to her hotel room until her father fell asleep. At approximately 11:00 pm, Jane Doe 1 left her hotel room and met Gonzalez at his vehicle in the hotel parking lot. Jane Doe 1 described the vehicle as a tan or gold Chevrolet Tahoe. Jane Doe 1 entered the vehicle and engaged in sexual activity with Gonzalez, including vaginal and oral sex. Inside the vehicle, Gonzalez took multiple videos and images of them engaged in sexually explicit conduct with his white iPhone. While still in the vehicle, Jane Doe 1 viewed one of the images Gonzalez took, which was an image of her vagina. Jane Doe 1 left Gonzalez's vehicle at approximately 1:30 am and returned to her hotel room.

14. During their encounter in Gonzalez's vehicle, Gonzalez provided Jane Doe 1 with an iPhone to use since her cell phone was not functioning properly and was unable to take pictures.

15. Gonzalez told Jane Doe 1 over the phone that he has talked to other girls that were her age, in an attempt to calm Jane Doe 1's fears regarding their relationship.

16. Jane Doe 1's mother provided investigators consent to search Jane Doe 1's cell phone. Text messages between the Jane Doe 1 and the phone number 240-609-2898 ("Gonzalez") were observed on Jane Doe 1's cell phone. The conversation appears to begin on June 20, 2018. Below are excerpts of the communications observed between the two accounts, with my comments in brackets:

Gonzalez: [A picture depicting a male's face is sent]

Gonzalez: Olay baby. How about a picture of you lowering your shirt up to your boobs. Where you just showing your shoulders. Please baby. But if you don't want to right no then hubby is fine with it.

Jane Doe 1: ...And I'm just not comfortable with sending nudes yet.

Gonzalez: Baby when you use her phone and take any pictures. Especially nude pics. Wish you would try though. Delete the pics from her phone. But I do want a picture of your boobs though. That would turn Papi on.

Gonzalez: I own your pussy baby. I'd lay your sexy ass on the bed and eat your pussy and spread your ass cheeks apart and stick my tongue deep in your sweet anal.

Gonzalez: Wish you were older and able to spend time with me

Jane Doe 1: So next week on Monday my dad and I are leaving early to go to Hershey park.

Gonzalez: Baby. Sneak your sisters phone and take pics and send them to your phone...

Jane Doe 1: I can't she has it locked... I can't wait to feel your love monday.

Gonzalez: Yes baby I'm so excited as well. I can't wait for Monday also. Gonna love you and make love to you baby. I can't wait to call you my wife.

Jane Doe 1: I mean I kinda am not legally tho

Gonzalez: What would really happen if we did fuck and I came inside your pussy. Would you wash your pussy right away or would you keep it inside your pussy for a day?

Jane Doe 1: You please bring condoms with you Monday. Just In case. I'm not taking birth control.

Gonzalez: Ok wifey. I want you to swallow my cum baby. But I'll bring condoms.

Jane Doe 1: Can you please make sure to stop at the store on your way and buy them please

Gonzalez: Why aren't you?

Jane Doe 1: Because I am not sexually active

Gonzalez: I love you too baby. Baby relax. Condom isn't going to break. That's why I want to cum inside your anal or you swallow.

Jane Doe 1: I feel like crying

Gonzalez: Why you feel like crying?

Jane Doe 1: I just wish my Monday was here and I feel like my last days of being a virgin is making me sad because I can only lose it once and I don't want it to hurt

Gonzalez: Okay baby. If your not ready then we won't fuck. I'm not pressuring you baby. I'm I love with you.

Gonzalez: Well I can't wait when you 18 and we living together and you do the wifey duties. I'm gonna eat your puss out first baby. Then you can suck my dick. You better swallow.

Jane Doe 1: When you go down on me can I take pictures from your phone so that you will always have them

Gonzalez: Yes baby you can take pictures while I'm eating your pussy

Jane Doe 1: And you should take a video when I give you your lap dance

Gonzalez: Yes I'll take a short video of everything. You giving me a lap dance. Me eating your pussy. Your sucking my dick.

Jane Doe 1: I hope we can pull this off without my dad finding out

Jane Doe 1: I mean its gonna be my first time and like the last thing I need is to get caught

Gonzalez: I agree. Maybe we should wait on losing your virginity babe. I'll eat your out and you suck my dick. We can do the 69.

Jane Doe 1: When you tell your fam about me are you gonna tell them my real age?

Gonzalez: Baby. We will discuss about what you asked me later.

Jane Doe 1: My fam is stressing me out ugh. I just can't wait until I'm 18.

Gonzalez: Baby gonna get your sexy ass a new phone

Gonzalez: Cause I have an old iPhone 4 that you can use til I buy you a new phone. Doesn't have a SIM card but you can still use it...

Jane Doe 1: Wrong hotel address its actually 631A Eisenhower boulavared 17111

Jane Doe 1: I'm in room 306

Gonzalez: It would be safer if you came outside to my car...

Jane Doe 1: I found a way to let you into the pool

Gonzalez: Don't you think it's risky for me to be in the pool? What id your dad takes notice?

Jane Doe 1: I should be coming down soon. 45 mins tops

Gonzalez: He's sleeping already? Nice. Well I'm out back to the very far corner.

Jane Doe 1: So how many condoms do you have

Gonzalez: ...Yes I have condoms.

Jane Doe 1: Its raining

Gonzalez: I know baby. We doing it in my truck

Gonzalez: Do you want to stay in the parking lot or do you want to go somewhere else where it's dark and secluded? I'm sure we are safe at the parking lot. I'm nervous and excited at the same time baby.

Jane Doe 1: Yup... I left my glasses in your car. Bed sound asleep. Hes. I need those glasses. Its priority just go in and leave them at the front desk or something

Jane Doe 1: We didn't get caught. My vagina hurts but it also feels really good and sensitive now I am laying here crying like a little bitch because I didn't want to leave you

Jane Doe 1: Oh baby I already left the hotel and yes I got my glasses and my charger thank you so much for turning around last night and dropping it off for me I love you so fucking much and I am so happy that you are my first person to have sex with and probably my last. I thought it was gonna hurt to tell you the truth but it felt really good.

Gonzalez: It did felt incredible baby. Told you that I would eat your pussy out and lick your ass. They way you got on your knees and started deep throatin my dick was amazing. Especially turned me on was when you were gagging on it

Jane Doe 1: I thought it was a dream but its not I'm finally a woman like I'm not a kid anymore I mean yes although I'm not a virgin anymore but like I hate being treated like I'm 5 and what's worse is when your family doesn't tell you things because you have autism and then they talk to you like your

2.I'm not that fucking bad though like I don't need my parents holding my hand for the rear of my life.

Gonzalez: I know how you feel my love. They shouldn't treat you like your 5 cause you have Autism. They should give you some space.

Gonzalez: Baby I understand. We will get married when you 18.

Gonzalez: Do you always delete our messages from your phone baby?...

17. During the conversations, Jane Doe 1 told Gonzalez she has depression and she sees a counselor.

18. Investigators obtained video surveillance footage from the Sleep Inn Hotel, located at 631A Eisenhower Boulevard, Harrisburg, Pennsylvania 17111. I reviewed the video footage recorded on June 27, 2018, and observed a tan SUV entering the hotel's parking lot and park in a parking spot. A male is seen exiting the vehicle and walk toward the hotel. The male appears similar to Gonzalez's driver's license picture. Approximately one hour later, the same male is seen walking back toward the tan SUV and entering the vehicle. Approximately one hour later, Jane Doe 1 is seen exiting her hotel room and walking to the tan SUV and appears to enter the vehicle that was still parked in the hotel's parking lot. Approximately 26 minutes later, flashes of light are seen going on and off inside the tan SUV.

19. An administrative subpoena was served on MocoSpace.com requesting subscriber information associated with the username Anthony_1012. MocoSpace.com provided a response that stated the account was in the name Anthony Gonzalez, associated with the email address bluediamondaj81@gmail.com, and with the date of birth XX/XX/1981.¹ MocoSpace also

¹ The month and day for the date of birth provided by MocoSpace matches Gonzalez' date of birth.

provided the profile picture for the account Anthony._1012. A review of the MocoSpace profile picture, Gonzalez's MVA picture, and the picture sent via text message on June 20, 2018, from the number 240-609-2898, determined that all three pictures are of the same person.

20. The MocoSpace subpoena response also included several login IP addresses connected to the MocoSpace account. One of the IP addresses was managed by Verizon Fios. Verizon provided records which establish that the IP address that accessed the MocoSpace.com account between various dates from June 3, 2018, and August 24, 2018, was assigned to: Alan Hickox, 704 Clayton Street, Aberdeen, Maryland 21001.

21. An administrative subpoena was served on Google requesting subscriber information associated with the account bluediamondaj81@gmail.com. Google provided the account was in the name Anthony Diamond, that the account was created on May 24, 2017, and associated with the phone number 410-776-9788. The response also included one login IP address that was managed by Verizon Fios. Verizon provided records which establish that the IP address that accessed the Google account on March 23, 2018, and July 9, 2018, was assigned to: Alan Hickox, 704 Clayton Street, Aberdeen, Maryland 21001.

22. T-Mobile provided records which establish that phone number 240-609-2898 was subscribed to by Anthony Gonzalez, 704 Clayton Street, Aberdeen, Maryland 21001. The account was active from at least May 25, 2018, and disconnected on June 30, 2018.

23. Sprint provided records which establish that phone number 240-609-2898 was subscribed to by Anthony Gonzalez, 704 Clayton Street, Aberdeen, Maryland 21001. The account was activated on June 30, 2018.

24. On November 15, 2018, search warrants for the Google account bluediamondaj81@gmail.com, for the MocoSpace account associated with the username

Anthony._1012, and for the Sprint and T-Mobile accounts associated with the phone number 240-609-2898 were submitted to and granted by United States Magistrate Judge Beth P. Gesner in the District of Maryland. On November 15, 2018, the search warrants were executed.

25. A review of the search warrant results provided by Google revealed over 2900 emails in the account. Below are examples of some of the emails located in the account:

a. An email sent on January 16, 2018, to bluediamondaj81@gmail.com from MocoSpace stated “Thank you for requesting the password to your MocoSpace account registered to this email address. The password for user anthony._1012 is:...”

b. An email sent on May 30, 2018, from bluediamondaj81@gmail.com stated “Hello. My name is Anthony. I’m interested in your job offer on your standing holding your sign. Contact me on my cell phone at 240-609-2898. Thank you.”

c. An email sent on June 19, 2018, to bluediamondaj81@gmail.com from MocoSpace stated “carmenbabes1999 sent you a message...”

26. A review of the Google Photos associated with the account revealed over 1800 files. Below are examples of some of the images located in the account:

a. An image titled “IMG_20171023_093008.jpg,” which depicts a document titled “Kohl’s Associate Accident Report.” The report is in the name Anthony J. Gonzalez, home address 704 Clayton Street, Aberdeen, Maryland 21001.

b. Numerous screenshots with the date “20180627” included in the titles of the images were located. The screenshots appear to be directions to 631 Eisenhower Blvd (the same address as Sleep Inn Hotel, located in Harrisburg, Pennsylvania 17111).

c. Four images with the date “20180810” included in their titles depict a tan Chevrolet Tahoe. In three of the images the Maryland tag 2DG8354 is visible.

d. The image titled "Screenshot_20180809-145824.png," depicts what appears to be a MocoSpace History screen. Included is the username "carmenbabes1999."

27. On August 23, 2018, and January 4, 2019, surveillance was conducted at 704 Clayton Street, Aberdeen, Maryland 21001. A tan Chevrolet Tahoe bearing Maryland tag 2DG8354 was observed parked in the street in front of the residence. The vehicle is registered to Cynthia Elena Delgadode Hickox, 704 Clayton Street, Aberdeen, Maryland 21001.

28. Maryland Motor Vehicle Administration records lists Anthony Joseph Gonzalez, Cynthia Elena Delgadode Hickox and Alan James Hickox at 704 Clayton Street, Aberdeen, Maryland 21001.

29. On January 18, 2019, based on the facts set forth above, the Honorable Magistrate Judge Stephanie A. Gallagher authorized search warrants for 704 Clayton Street, Aberdeen, Maryland 21001, for Gonzalez's person, and for the tan Chevrolet Tahoe bearing Maryland tag 2DG8354. On January 24, 2019, surveillance was established at 704 Clayton Street, Aberdeen, Maryland 21001, in preparation for the search warrants to be executed that morning. Initially, the tan Chevrolet Tahoe was not observed at or near the residence. At approximately 6:24 am, the tan Chevrolet Tahoe bearing Maryland tag 2DG8354 pulled up near the residence. After a few minutes, the tan Chevrolet Tahoe bearing Maryland tag 2DG8354 was observed leaving the residence. Investigators conducted a car stop and identified Gonzalez as the driver of the vehicle. Gonzalez was advised of the search warrants for his person and vehicle. Gonzalez was searched and a white iPhone was seized from his pocket. About the same time, the search warrant for 704 Clayton Street, Aberdeen, Maryland 21001 was executed. Gonzalez was asked if he consented to an interview at 704 Clayton Street, Aberdeen, Maryland 21001, and he agreed.

30. Gonzalez was escorted back to the residence, and after being advised that he was

not under arrest, he was free to leave, and speaking with investigators was voluntary, Gonzalez agreed to be interviewed. During the interview, Gonzalez provided his cellular telephone number as 240-609-2898. Gonzalez advised that he normally spends the night at 704 Clayton Street, which is owned by his mother and stepfather, however Gonzalez also occasionally stays at his girlfriend's apartment, located at **221 Perrywood Court, Apartment 104, Aberdeen, Maryland**. Gonzalez advised he stayed at his girlfriend's apartment that previous night and came home briefly to borrow money from his mother.

31. Gonzalez stated that he has three phones: a white iPhone (located in his pocket at the time of his arrest), a black iPhone 6 (located in the tan Chevrolet Tahoe), and a black Motorola ZTE cell phone (located in the tan Chevrolet Tahoe). Gonzalez stated that all of his phones are password protected, no one else uses his phones, and he has not provided his passwords to anyone else. Gonzalez has accounts with the following social media sites/apps: Facebook, Instagram and Kik, but he initially denied remembering any of the usernames or passwords. Gonzalez said he could not remember his email account associated with the ZTE cell phone, but later acknowledged that "bluediamond81@gmail.com" was likely the Gmail account linked to that ZTE device. Gonzalez later provided the email account anthonylegend15@gmail.com as being attributed to the black iPhone 6. Gonzalez further stated that he uses the legendarpapi81@gmail.com account for work matters. Gonzalez admitted searching for and viewing pornography on his cell phones, but denied ever seeking out child pornography.

32. Gonzalez admitted to having both a MySpace account and a MocoSpace account, but initially claimed he had not used either account in several years. Gonzalez initially denied traveling outside of Maryland, except to Delaware and New Jersey. Gonzalez eventually

admitted driving in his Chevrolet Tahoe to a hotel in Pennsylvania, located approximately an hour from Hershey Park, in order to meet with Jane Doe 1. Gonzalez said that he met Jane Doe 1 on MocoSpace sometime last year and claimed she told him she was 18. When he arrived at the hotel, Gonzalez met Jane Doe 1 at the indoor hotel pool, where they "hugged and made out." Eventually Gonzalez and Jane Doe 1 walked to his Chevrolet Tahoe, which was parked in the hotel parking lot, and they engaged in sexually explicit conduct, including vaginal intercourse, anal intercourse and oral sex. Gonzalez admitted to videotaping the sex acts using his white iPhone. Gonzalez indicated that he still had sexually explicit videos and photos of Jane Doe 1 on his white iPhone. Gonzalez estimated he had two videos and four sexually explicit photos of Jane Doe 1. Gonzalez stated that he sent one of the sexually explicit images of Jane Doe 1 to his black iPhone. After being shown some of the chat messages between Gonzalez and Jane Doe 1, Gonzalez acknowledged that he knew Jane Doe 1 was 16 years old before they met at the hotel in Pennsylvania. Gonzalez said he and Jane Doe 1 stopped communicating because she wanted them to get married and move to Virginia and he told her he could not leave his children.

33. Gonzalez admitted that he has communicated with other females who are under 18 years old. Gonzalez provided the name of a 15-year-old female from Tennessee, Jane Doe 2, whom he met on Kik. Gonzalez stated that he believes he has approximately four sexually explicit images of Jane Doe 2.

34. Gonzalez also identified a 16-year-old female who resides in the Philippines, Jane Doe 3, whom he is also communicating with and has sent him sexually explicit images and videos. Gonzalez identified a 31 second long sexually explicit video that was located on one of his cell phones, dated October 25, 2018, as a video that was sent to him from Jane Doe 3 at his request. Gonzalez denied paying Jane Doe 3 for any of the photos, but stated that he intended to

pay her in the future. Gonzalez stated that he wanted Jane Doe 3 to move to Maryland "when she turns 18."

35. Investigators reviewed the images and videos located on both the white iPhone and the black iPhone with Gonzalez. Gonzalez identified Jane Doe 1 in some clothed pictures and after locating only one image on the white iPhone that Gonzalez took of Jane Doe 1 the night they engaged in sexual activity, Gonzalez stated that he may have saved the other sexually explicit images and videos he took of Jane Doe 1 in one of his iCloud or Google Drive accounts.

36. On January 24, 2019, Gonzalez and his girlfriend each signed a consent to search form to search the residence located at **221 Perrywood Court, Apartment 104, Aberdeen, Maryland**. While searching the residence five cell phones and one tablet were found and seized.

37. On February 13, 2019, search warrants for the digital devices seized from **221 Perrywood Court, Apartment 104, Aberdeen, Maryland**, the Google accounts anthonylegend15@gmail.com and legendarypapi81@gmail.com, and for the Apple accounts associated with el_legendario81@icloud.com and legendarypapi81@gmail.com were submitted to and granted by United States Magistrate Judge J. Mark Coulson in the District of Maryland. On February 13, 2019, the search warrants were executed.

38. The forensic examination of the digital devices seized from **221 Perrywood Court, Apartment 104, Aberdeen, Maryland**, is still ongoing. One device seized, a Black Motorola cell phone, model: XT875, revealed that a majority of the phone activity was from 2013 to 2015. The cell phone contained images of adult pornography, a few images of clothed or partially clothed females whose ages were difficult to determine, and pictures of Gonzalez and the mother of his children. The cell phone also contained the following web history:

“Anal and some deep throat with a horny teen Mobile Video,”
“Teen nerd giving good deep throat Mobile Video,”
“Young Girls Sex – Teens Porn Tube.”

39. A review of the search warrant results provided by Google for the anthonylegend15@gmail.com account revealed 36 email notifications between January 30, 2019, and February 13, 2019, from Facebook that an account in Jane Doe 3’s name sent a Facebook message. On January 26, 2019, Facebook sent a message to anthonylegend15@gmail.com that the phone number 240-609-2898 was added to the Facebook account.

40. A review of the search warrant results provided by Google for the legendarypapi81@gmail.com account revealed 62 email notifications between December 15, 2018, and January 2, 2019, from Facebook that an account in Jane Doe 3’s name sent a Facebook message. On February 2, 2019, a Facebook friend request was sent from an account in Jane Doe 3’s name and later that same day a Facebook message was sent stating Jane Doe 3 “sent you a friend request. If you’d like to be friends with her, confirm your connection.”

41. A review of the Google Photos associated with legendarypapi81@gmail.com revealed eighteen images of interest. The EXIF² metadata within the eighteen images indicated that ten of the images were produced on June 27, 2018, starting around 10:00 pm, and eight of the images were produced on June 28, 2018, just after midnight, with an Apple iPhone SE. GPS coordinates were also found within the EXIF metadata of the eighteen images. The GPS coordinates were queried and it was determined that they all resolved just outside of the Sleep Inn Hotel, located at 631A Eisenhower Boulevard, Harrisburg, Pennsylvania 17111.

42. The first six images depict what appear to be self-taken pictures of Jane Doe 1

² EXIF data stands for Exchangeable image file format and is information that is embedded within the image or video files themselves. Some of the data embedded could be date and time information, camera settings to include make and model of the camera, and location or GPS data.

and Gonzalez's faces. In one of the six images Jane Doe 1 and Gonzalez are kissing. Seven of the images depict a close up of a vagina. In three of the seven images, an adult hand is digitally penetrating the vagina. Another image containing the EXIF data is the same picture of Jane Doe 1 that was found on Gonzalez white iPhone (mentioned in paragraph 40).

43. Also located in the Google Photos account associated with legendarypapi81@gmail.com were numerous pictures of Gonzalez and his children.

44. In June 2019, Jane Doe 2, born in 2004, was interviewed at her residence located in Tennessee. Jane Doe 2 stated she met Gonzalez through a mutual online friend and that she communicated with Gonzalez via Facebook Messenger, Kik and telephonically. They began communicating two years ago when Jane Doe 2 was 13 years old. Jane Doe 2 stated that Gonzalez knew her age and that he had told her he lived in Maryland, was 37 years old, had a wife and two kids, and lived with his mother. Jane Doe 2 stated that over the course of their communications, Gonzalez tried to get her into a relationship with him, however since he was married and had two children, she denied his requests to begin a relationship and meet in person and would block him from time to time on social media and on her cell phone. Jane Doe further explained that when she blocked him, their mutual friend would message her and ask why she blocked Gonzalez and say things such as, "Why don't you love him?" Jane Doe 2 denied meeting Gonzalez in person and stated that she had not spoken to Gonzalez since January 2019. Jane Doe 2 disclosed that Gonzalez sent her numerous images of himself nude and masturbated live on video with her watching and would also ask her to perform certain things on video chat as well. Gonzalez asked her to masturbate and send nude images of herself, including her genitals, which she stated that she did a few times for him upon his request. Jane Doe 2 could not recall how many times this occurred but stated it occurred often.

45. In October 2019, Jane Doe 3, born in 2002, was interviewed in the Philippines. Jane Doe 3 advised she has known Gonzalez for approximately a year and a half and that they met online on a social media application. Gonzalez initiated the chat with Jane Doe 3 and stated he was from Aberdeen, Maryland, in the United States. After meeting, Jane Doe 3 and Gonzalez mostly communicated on Facebook. Gonzalez told Jane Doe 3 that he was not preying on teenagers and that he stopped talking to other females. Jane Doe 3 liked talking to Gonzalez because she was his girlfriend and they would talk about everything like his work, kids, and Jane Doe 3's school. Gonzalez told Jane Doe 3 that he was her boyfriend within one to two months after meeting online. Gonzalez asked for pictures of Jane Doe 3's face as soon as they started communicating. When Gonzalez said he was Jane Doe 3's boyfriend, he began asking for pictures of Jane Doe 3's nude body. When Gonzalez asked Jane Doe 3 for pictures of her body she was shocked and confused and hesitant to send any pictures at first. Eventually Jane Doe 3 sent Gonzalez the pictures he requested because Gonzalez said he was her boyfriend and he wanted to see how she looked. Jane Doe 3 felt like she could not say no to Gonzalez because she was his girlfriend and she thought she had to do what he wanted her to do. Jane Doe 3 told Gonzalez she was 15 years old when he began asking for pictures of her body. Gonzalez told Jane Doe 3 that he was 38 years old and that he had two kids. Gonzalez told Jane Doe 3 that when she turned 18 he would travel to the Philippines to see her. Jane Doe 3 sent numerous nude pictures of herself to Gonzalez at his request two to three times a week and she thought it was more than 500 times. Jane Doe 3 did not like taking videos of herself and only sent a few sexual videos to Gonzalez. Gonzalez stopped communicating with Jane Doe 3 in the fall of 2018 for approximately two months. He reinitiated communication with Jane Doe 3 and began asking for nude pictures again in November 2018. Jane Doe 3 never allowed video chat with Gonzalez

because she was uncomfortable with video chatting because she is shy. Jane Doe 3 no longer used the online social media application on which they met because Gonzalez said she was not allowed to talk to anyone else. Gonzalez originally used a Facebook account with his true name but it was shut down because of the pictures she sent him on Facebook. Gonzalez created new accounts on Facebook using his true name. Jane Doe 3 and Gonzalez also talk on the phone one to two times a week for approximately one hour or less. Gonzalez never sent Jane Doe 3 money or gifts but he told her he would send her a teddy bear but she never received one.

46. In February 2019, Gonzalez told Jane Doe 3 the FBI confiscated his phones and arrested him. Gonzalez told Jane Doe 3 he was going to get in trouble for what he did in the past. Gonzalez told Jane Doe 3 he admitted to having sex with a person under 18 years old in the United States. Jane Doe 3 remembered not talking to Gonzalez for a few weeks in January and February of 2019. Gonzalez seldom talked about the situation with the FBI. When Jane Doe 3 asked Gonzalez, he would tell her he might go to jail because of the charges.

47. Gonzalez sent pictures of his face to Jane Doe 3 daily. Gonzalez only sent a few nude pictures of himself. The last time Jane Doe 3 received a nude picture of Gonzalez was in September 2019. Gonzalez requested Jane Doe 3 to send videos of herself masturbating but she was uncomfortable taking videos of herself so she did not send many videos. Gonzalez sent one video of himself masturbating in July or August of 2019. Gonzalez told Jane Doe 3 that she is his woman and would call her names if she would not send him pictures. The last time Jane Doe 3 sent nude pictures to Gonzalez, at his request, was the week of October 7, 2019. Jane Doe 3 advised that she last talked to Gonzalez on Facebook during the week of October 7, 2019.

48. In September 2019, Facebook sent Cybertipline Reports 55697635 and 55795410 to NCMEC and listed the Incident Types as "Child Pornography (possession, manufacture, and

distribution).” The incident dates were listed as occurring in September 2019. The reports were processed by NCMEC in September 2019 and provided to law enforcement in the Philippines.

49. Both reports stated that the Facebook user *angela.gonzalez234*³ uploaded numerous files. The recipient of the reported content was provided as:

First Name:	Anthony
Last Name:	Delgado
Email:	delgado.aj011@gmail.com (Verified)
Age:	38
DOB:	1981-XX-XX ⁴
Gender:	Male
Profile Url:	http://www.facebook.com/people/Anthony-Delgado/100041348412416
Account ID:	100041348412416
Sent in product:	Messenger

50. Facebook also provided messages that were sent in September 2019, immediately preceding and following the uploaded files, from the account associated with *delgado.aj011@gmail.com*. Some of the messages were: “Better fucking rub it for daddy,” “Mmmmmm rub it you sexy slutty whore of mine,” “Mmmmmm baby. Yes what’s daddy is tryna do is get you to play with your pussy n get you super horny,” “I wanna stick my tongue deep inside your anal,” “Spread your pussy lips slutty whore. Daddy wants to see your insides. Even a close up on your anal. Take also some booty pics n,” “Take pics of you using your finger and licking it babe,” “Take some pics of your young tight virgin cherry pussy,” “Daddy said take a pic NOW,” “Daddy said take a close up pic of Your anal,” “Spread them cheeks with both hands babe.”

51. On December 3, 2019, search warrants for the files associated with the Cybertipline Reports 55697635 and 55795410, the Facebook accounts associated with vanity

³ This account includes Jane Doe 3’s first name.

⁴ The month and day for the date of birth provided by Facebook matches Gonzalez’ date of birth.

name angela.gonzalez234, email address delgado.aj011@gmail.com, email address anthonylegend15@gmail.com, and email address legendarypapi81@gmail.com, and the Google account delgado.aj011@gmail.com were submitted to and granted by United States Magistrate Judge A. David Copperthite in the District of Maryland. On December 3, 2019, the search warrants were executed. The results for the search warrants on the Facebook and Google accounts are still pending.

52. A review of the images provided with the Cybertipline Reports revealed the following:

a. Cybertipline Report 55697635: The report contained 22 images - 5 images of Jane Doe 3's face and 17 close up images of female genitalia. Some of the images appear to be duplicates.

b. Cybertipline Report 55795410: the report contained 40 images – 1 image of Jane Doe 3's face, 1 image of Jane Doe 3 lifting her shirt up and exposing her bra, and 38 images of female genitalia, to include one image of a finger penetrating her vagina. Some of the images appear to be duplicates.

53. On October 30, 2019, November 1, 2019, November 4, 2019, November 8, 2019, November 12, 2019, November 21, 2019, November 25, 2019, and December 2, 2019, surveillance was conducted at **221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001**. A **2009 Dodge Caravan bearing Virginia tag ULM1042⁵** was observed each time parked in the neighborhood streets surrounding the apartment complex. The vehicle is registered to Anthony Joseph Gonzalez, 704 Clayton Street, Aberdeen, Maryland 21001.

54. On December 3, 2019, a ruse was conducted 704 Clayton Street, Aberdeen, Maryland 21001 (Gonzalez's previous residence and the address where Gonzalez's mother and stepfather reside). A Harford County Sheriff's investigator approached a white male, believed to

⁵ Prior to November 12, 2019, the license plate for the Dodge Caravan was Maryland tag 7DZ2361, which was registered to Anthony Joseph Gonzalez, 704 Clayton Street, Aberdeen, Maryland 21001.

be Alan Hickox, Gonzalez's stepfather, outside of the residence. The investigator explained that there was recent parking complaints regarding the 2009 Dodge Caravan and that the vehicle was registered in Gonzalez's name at the address 704 Clayton Street, Aberdeen, Maryland 21001. Hickox stated that Gonzalez often stayed at his girlfriend's apartment located at Perrywood Garden's Apartments.⁶ The investigator then proceeded to **221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001** and Gonzalez's girlfriend answered the door. Again the investigator explained that there were recent parking complaints regarding the 2009 Dodge Caravan and that the vehicle was registered in Gonzalez's name at the address 704 Clayton Street, Aberdeen, Maryland 21001. The investigator stated that he spoke to someone at the Clayton Street address and was told Gonzalez often stayed at her apartment. Gonzalez's girlfriend confirmed that Gonzalez stayed at her apartment often and stays the night with her. At that time, Gonzalez came to the front door from inside the apartment. Gonzalez confirmed his vehicle and the new Virginia tags and confirmed he stayed either his girlfriend's apartment or his mother's residence. Gonzalez stated if his van is at the apartment complex then he is at the apartment complex. Gonzalez parked his van in the surrounding streets to avoid his vehicle from being towed.

CONCLUSION

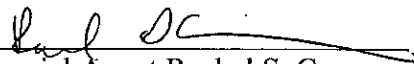
55. Based upon all of the information set forth in this application, I respectfully submit that there is probable cause to believe that Anthony Joseph Gonzalez violated Title 18, United States Code, Section 2251(a) (production of child pornography).

56. Based on the foregoing information, I also have probable cause to believe that contraband, and evidence, fruits, and instrumentalities of the TARGET OFFENSES as set forth

⁶ 221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001 is part of the Perrywood Garden Apartment Complex.

19-3996 ADC 19-3997 ADC 19-3998 ADC

herein and in Attachment B are currently contained in the TARGET LOCATIONS more fully described in Attachments A1, A2, and A3. I therefore respectfully request that search warrants be issued authorizing the search of the locations described in Attachments A1, A2, and A3 for the items described in Attachment B and authorizing the seizure and examination of any such items found therein.


Special Agent Rachel S. Corn
Federal Bureau of Investigation

Subscribed and sworn to before me this 6th day of December 2019.


HONORABLE A. DAVID COPPERTHITE
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A1

DESCRIPTION OF RESIDENTIAL PREMISES TO BE SEARCHED

221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001 (the SUBJECT PREMISES). The SUBJECT PREMISES to be searched is an apartment located on the first level of a three-story building. The exterior of the building is red and brown brick and tan siding and the numbers "221" are displayed to above the front entry door. The numbers "104" are displayed above the peep hole located on the outside of the front door to the unit. The photograph below depicts the building and the front door to the specific unit.



ATTACHMENT A2

DESCRIPTION OF PERSON TO BE SEARCHED

Anthony Joseph Gonzalez, DOB: XX/XX/1981, SSN: XXX-XX-5114, who is a Hispanic male, with brown hair, brown eyes, and is approximately 5'10" tall. A photograph of Gonzalez is shown below.



ATTACHMENT A3

DESCRIPTION OF VEHICLE TO BE SEARCHED

A 2009 Dodge Caravan bearing Virginia tag ULM1042 and vehicle identification number 2D8HN44E69R626075.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED AND SEARCHED

221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001; the person Anthony Joseph Gonzalez; and the 2009 Dodge Caravan bearing Virginia tag ULM1042

1. Computer(s), computer hardware, software, related documentation, passwords, data security devices (as described below), videotapes, and or video recording devices, and data that may constitute instrumentalities of, or contain evidence related to, this crime. The following definitions apply to the terms as set out in this affidavit and attachment:

a. Computer hardware: Computer hardware consists of all equipment, which can receive, capture, collect analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, or similar computer impulses or data. Hardware includes any data processing devices (including but not limited to cellular telephones, central processing units, laptops, tablets, eReaders, notes, iPads, and iPods; internal and peripheral storage devices such as external hard drives, thumb drives, SD cards, flash drives, USB storage devices, CDs and DVDs, and other memory storage devices); peripheral input/output devices (including but not limited to keyboards, printer, video display monitors, and related communications devices such as cables and connections), as well as any devices mechanisms, or parts that can be used to restrict access to computer hardware (including but not limited to physical keys and locks).

b. Computer software is digital information, which can be interpreted by a computer and any of its related components to direct the way they work. Software is stored in electronic, magnetic, or other digital form. It commonly includes programs to run operating systems, applications, and utilities.

c. Documentation: Computer related documentation consists of written, recorded, printed, or electronically stored material, which explains or illustrates how to configure or use computer hardware, software, or other related items.

d. Passwords and Data Security Devices: Computer passwords and other data security devices are designed to restrict access to or hide computer software, documentation or data. Data security devices may consist of hardware, software or other programming code. A password (a string of alpha numeric characters) usually operates a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, and circuit boards. Data security software of digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby trap" protected data to make it inaccessible or unusable, as well as reverse the progress to restore it.

2. Any and all notes, documents, records, or correspondence pertaining to child pornography as defined under Title 18 U.S.C. § 2256(8).

3. Any and all correspondence identifying persons transmitting, receiving or

possessing, through interstate commerce including by U.S. Mails or by computer, any visual depictions of minors engaged in sexually explicit conduct, as defined in Title 18 U.S.C. § 2252A(a)(5)(B) & (b)(2), 2256(2).

4. Any and all records, documents, invoices and materials that concern any accounts with Sprint, T-Mobile, Google, MocoSpace, Facebook, or any other Internet Service Provider, screen names, online accounts, cellular accounts, websites, or email accounts.

5. Any and all web cameras; cameras, film, cell phones with cameras and/or internet capability, or other photographic equipment.

6. Any and all visual depictions of minors, to include depictions of minors engaged in sexually explicit conduct, nude pictures, and modeling.

7. Any and all documents, records, or correspondence pertaining to occupancy, ownership or other connection to 221 Perrywood Court, Apartment 104, Aberdeen, Maryland 21001 and the 2009 Dodge Caravan bearing Virginia tag ULM1042.

8. Any and all diaries, notebooks, notes, address books, pictures, emails, chats, directions, maps, banking, travel, documents, and any other records reflecting personal contact and any other activities with minors.

9. Any and all financial documents, records, receipts, credit card statements, and/or correspondence relating to payments sent and/or received in connection with minors engaged in sexually explicit conduct, nude pictures, modeling, and/or hosting websites.

10. Any and all notes, documents, records, photos or correspondence that indicate a sexual interest in children, including, but not limited to:

- a. Correspondence with children;
- b. Any and all visual depictions of minors;
- c. Internet browsing history;
- d. Books, logs, emails, chats, diaries and other documents.

As used above, the terms "records, documents, messages, correspondence, data, and materials" includes records, documents, messages, correspondence, data, and materials, created, modified or stored in any form, including electronic or digital form, and by whatever means they may have been created and/or stored. This includes any handmade, photographic, mechanical, electrical, electronic, and/or magnetic forms. It also includes items in the form of computer hardware, software, documentation, passwords, and/or data security devices.

11. For any computer, computer hard drive, or other physical object upon which computer data can be recorded (hereinafter, "COMPUTER") that is called for by this warrant, or that might contain things otherwise called for by this warrant:

- a. evidence of who used, owned, or controlled the COMPUTER at the time

the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;

b. evidence of software that would allow others to control the COMPUTER, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;

c. evidence of the lack of such malicious software;

d. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;

e. evidence of counter forensic programs (and associated data) that are designed to eliminate data from the COMPUTER;

f. evidence of the times the COMPUTER was used;

g. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER; documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;

h. contextual information necessary to understand the evidence described in this attachment; and

i. image and video files that depict children engaged in sexually explicit conduct pursuant to Title 18 U.S.C. § 2256.

12. With respect to the search of any of the items described in paragraphs 1 through 10 above which are stored in the form of magnetic or electronic coding on computer media or on media capable of being read by a computer with the aid of computer-related equipment (including CDs, DVDs, thumb drives, flash drives, hard disk drives, or removable digital storage media, software or memory in any form), the search procedure may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, to minimize the review of information not within the list of items to be seized as set forth herein, while permitting government examination of all the data necessary to determine whether that data falls within the items to be seized):

a. surveying various file "directories" and the individual files they contain (analogous to looking at the outside of a file cabinet for markings it contains and opening a drawer believed to contain pertinent files);

b. "opening" or cursorily reading the first few "pages" of such files in order to determine their precise contents;

c. "scanning" storage areas to discover and possibly recover recently deleted

files;

- d. "scanning" storage areas for deliberately hidden files; or
- e. performing key word searches or other search and retrieval searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are intimately related to the subject matter of the investigation.

13. If after performing these procedures, the directories, files or storage areas do not reveal evidence of child pornography or other criminal activity, the further search of that particular directory, file or storage area, shall cease.